

EXHIBIT 6

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES,ET AL.)
v.)
Plaintiffs,)
JASON KESSLER, ET AL.) Civil Action No.
Defendants.) 3:17-cv-00072-NKM

)

**DEFENDANT NATIONALIST FRONT RESPONSES TO PLAINTIFFS' SECOND SET OF
INTERROGATORIES TO NON-DEFAULTED ENTITY DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 33, Defendant Nationalist Front (NF), by and through his attorney, hereby submits these answers and objections to the second set of interrogatories No. 1-14 submitted by Plaintiffs Elizabeth Sines, et al . Defendant NF reserves the right to supplement, amend, or correct all or any part of this response as permitted under the Federal Rules of Civil Procedure and the right to object to the admissibility of any evidence related to this response.

PRELIMINARY STATEMENT

All of the responses contained herein are based only upon such information and documents as are presently available to and specifically known by Defendant NF. The following responses are given without prejudice to Defendant NF's right to produce evidence of any subsequently-discovered fact(s) at the time of trial. These responses are made in a good faith effort to supply as much factual information and as much specification of legal contentions as is presently known, but should in no way be the prejudice of Defendant NF in relation to further discovery. In providing such answers, Defendant NF hereby specifically objects to all questions that either directly or indirectly call for the

disclosure or production of privileged material and material subject to work product protection. None of the answers or information contained herein or provided to the Plaintiffs shall be deemed to be a waiver to such objection.

GENERAL OBJECTIONS

1. Defendant NF objects to the interrogatories to the extent that they seek information or the production or identification of documents not in the possession, custody or control of Defendant NF within the meaning of the Federal Rules of Civil Procedure or the Federal Rules of Evidence on the grounds that said interrogatories are overbroad, unreasonable, unduly burdensome, improper and that their scope is not limited to information known to Defendant NF.
2. Defendant NF objects to the interrogatories to the extent that they seek information or the production or identification of documents protected by the attorney-client privilege, by the work product privilege, or by any other privilege.
3. In responding to the interrogatories, Defendant NF has conducted a reasonable inquiry of those persons most likely to possess information responsive thereto and a reasonable search of records where information interrogated would most likely be maintained. To the extent plaintiffs see to require Defendant NF to respond further, Defendant NF objects on the grounds that the interrogatories are, to said extent, overbroad, unduly burdensome, unreasonable and oppressive.
4. Defendant NF will make any documents identified in response to any interrogatory available for inspection and copying at a time mutually convenient to the parties and their respective counsel. By agreeing to produce responsive documents, Defendant NF does not acknowledge that such documents exist.

5. Defendant NF submits these responses without conceding the relevance or materiality of the subject matter of any document or information which may be produced or identified, and without prejudice to Defendant NF's right to object to further discovery or to object to the admissibility of any proof on the subject matter of any discovery of any document. Defendant NF reserves the right to change or to supplement any response that may subsequently appear to be incomplete or incorrect. Defendant NF reserves the right to object at such a later time that any document produced or response given hereunder is protected by the attorney-client privilege, or as attorney work product or trial preparation material, and that the production or response was inadvertent.
6. To the extent the interrogatories seek to impose upon Defendant NF any duties or requirements in excess of those specified in the Federal Rules of Civil Procedure, local rules, or applicable law, Defendant NF objects to same.
7. Defendant NF objects to each interrogatory to the extent it is repetitive and/or substantially overlaps with other interrogatories. When a response is equally responsive to more than one interrogatory, Defendant NF will respond only once.
8. Each of the foregoing general objections is expressly incorporated by reference into each of the specific responses of Defendant NF to the interrogatories. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, Defendant NF does not waive its right to amend its responses.

ANSWERS AND SPECIFIC OBJECTIONS

Without waiving the Preliminary Statement and General Objections set forth above, and subject to them, Defendant NF objects and responds to the Plaintiffs' Second Set of Interrogatories as follows:

INTERROGATORY NO. 1:

Describe in Detail the structure of Your organization as it existed between January 2017 and January 2018, including but not limited to: (a) each level, group, division, subdivision, unit, branch, or segment (whether formal or informal); (b) the titles, roles and responsibilities of each position (whether formal or informal) associated with each level, group, division, sub-division, unit, branch or segment; (c) the hierarchy, relationships, and ranks of each level, group, division, sub-division, unit, branch or segment relative to each other; (d) the hierarchy, relationship and ranks of each position within and across such groups, divisions, sub-divisions, units, branches or segments and (e) the name(s) of every person who occupied each position from January 2017 to January 2018.

RESPONSE TO INTERROGATORY NO. 1:

Defendant Nationalist Front (NF) was never an organization. From January 2017 to January 2018, the Nationalist Front was an alliance of many separate individual organizations.

INTERROGATORY NO.2:

Describe in Detail the core values, beliefs, and mission of Your organization, and any manner in which Your organization expresses, Communicates, or promotes those core values, beliefs and mission.

RESPONSE TO INTERROGATORY NO.2:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Two. To the extent an answer is required the defendant answers as follows, NF was a voluntary alliance that encouraged nationwide, regional, and local like-minded organizations to work together.

INTERROGATORY NO.3:

Describe in Detail the process by which an individual becomes a Member of Your organization, including but not limited to any prerequisites or requirements, conditions of

membership, application process, investigation or vetting process, decision or approval process, initiation procedures, or rituals.

RESPONSE TO INTERROGATORY NO.3:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Three. To the extent an answer is required the defendant answers as follows: NF was a voluntary alliance that encouraged like-minded nationwide, regional, and local organizations to work together.

INTERROGATORY NO.4:

Identify each member of Your organization who participated in any aspect of planning or organizing in advance of the Unite the Right rally, and Describe in Detail the nature of the planning or organizing in which each such Member participated.

RESPONSE TO INTERROGATORY NO. 4:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Four. Due to the time that has transpired since the events described, Defendant NF has no memory of such incidents or events described in Interrogatory Number Four.

INTERROGATORY NO. 5:

Identify each Member of Your organization who attended the Unite the Right rally.

RESPONSE TO INTERROGATORY NO. 5:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Five. Due to the time that has transpired since the events described, Defendant NF has no memory of such incidents or events described in Interrogatory Number Five.

INTERROGATORY NO. 6:

Identify each method of communication used by Members of Your organization from January 2017 to January 2018 to Communicate with each other, including but not limited to

text-message communications, email communications, telephone conversations, in-person communications, communications on Discord, communications on Gab, communications on Facebook, communications on What's App, etc.

RESPONSE TO INTERROGATORY NO. 6:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Six. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number Six.

INTERROGATORY NO. 7:

Identify and Describe in Detail each Contact or Communication of any kind you had with each one of the other Defendants between January 2017 and August 12, 2017, including for each Contact or Communication, the nature or content of the Contact or Communication, the method of Contact or Communication used, where and when the Contact or Communication took place, and anyone else who participated in the Contact or Communication.

RESPONSE TO INTERROGATORY NO. 7:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Seven. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number 7.

INTERROGATORY NO. 8:

Identify all expenses You incurred in planning, organizing, or attending the Unite the Right rally and the sources of funding and method of payment used to satisfy those expenses.

RESPONSE TO INTERROGATORY NO.8:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Eight. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number Eight.

INTERROGATORY NO. 9:

Identify and Describe in Detail each case in which You were charged in Criminal Proceedings that resulted in a conviction, whether state or federal, including for each such case, the full title of the action, court, docket number, a description of the allegations, the disposition, and the sentence.

RESPONSE TO INTERROGATORY NO. 9:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Nine.

INTERROGATORY NO. 10:

Identify each legal matter, whether federal, state, criminal, civil, administrative, or otherwise, concerning the Events in which You have participated as a party or a witness, including but not limited to giving any testimony (written or verbal) in depositions, hearings, trials, or any other legal proceeding.

RESPONSE TO INTERROGATORY NO. 10

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Ten.

INTERROGATORY NO. 11:

Describe in Detail any Advertisement or Promotional Material You displayed or posted whether online or otherwise, in which You Advertised or promoted the Unite the Right rally, including where, when, how, and for what period of time you displayed or posted such Advertising or Promotional Material and the content of such Advertisement or Promotional Material.

RESPONSE TO INTERROGATORY NO. 11:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Eleven. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number Eleven.

INTERROGATORY NO. 12:

Identify each Communication concerning the Events that You had with each member of Law Enforcement, whether before, after, or during the Events, including the name of the member of Law Enforcement, when, where, and how each Communication took place, and the nature or content of each Communication.

RESPONSE TO INTERROGATORY NO. 12:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Twelve. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number Twelve.

INTERROGATORY NO. 13:

Identify each Communication concerning the Events that You had with any Government Official, whether before, after, or during the Events, including the name of the Government Official, when, where, and how each Communication took place, and the nature or content of each Communication.

RESPONSE TO INTERROGATORY NO. 13:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Thirteen. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number Thirteen.

INTERROGATORY NO. 14:

Identify each Communication concerning the Events that You had with any School Official, whether before, after, or during the Events, including the name of the School Official, when, where and how each Communication took place, and the nature or context of each Communication.

RESPONSE TO INTERROGATORY NO. 14:

Defendant Nationalist Front lacks information or knowledge sufficient to answer Interrogatory Number Fourteen. Due to the time that has transpired since the events described, Defendant NF has no memory of such incident or events described in Interrogatory Number Fourteen.